

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE
COMMISSION

In The Matter of:

AN ADJUSTMENT OF THE ELECTRIC
RATES, TERMS AND CONDITIONS
OF KENTUCKY UTILITIES COMPANY

CASE NO. 2003-00434

PETITION FOR FULL INTERVENTION
OF
THE KROGER COMPANY

Pursuant to K.R.S. §278.310 and 807 KAR 5:001 Section 3(8), The Kroger Company (“Kroger”) requests that it be granted full intervenor status in the above captioned proceeding and states in support thereof as follows:

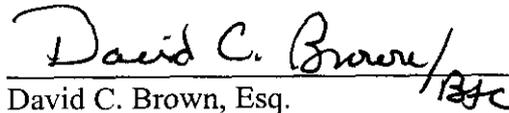
1. Kroger operates a substantial number of retail stores throughout the service area of Kentucky Utilities Company (“KU”) and purchases electric energy for these facilities from KU. Electric service represents a significant cost of doing business for Kroger. Kroger therefore has a special interest in this proceeding in that the Application may have a significant impact on the rates paid by Kroger to KU. The position of Kroger cannot be adequately represented by any existing party. Kroger intends to play a constructive role in the Commission’s decision making process herein and its participation will not unduly prejudice any party.

2. The attorney for Kroger authorized to represent it in this proceeding and to take service of all documents is:

David C. Brown, Esq.
Stites & Harbison, PLLC
400 W. Market Street, Suite 1800
Louisville, KY 40202
Phone: (502) 681-0421
Fax: (502) 587-6391
E-mail: dbrown@stites.com

WHEREFORE, Kroger requests that it be granted full intervenor status in the above captioned proceeding.

Respectfully submitted,

A handwritten signature in black ink that reads "David C. Brown" followed by a stylized flourish or initials.

David C. Brown, Esq.
Stites & Harbison, PLLC
1800 Aegon Center
400 West Market Street
Louisville, KY 40202
Counsel for The Kroger Company

CERTIFICATE

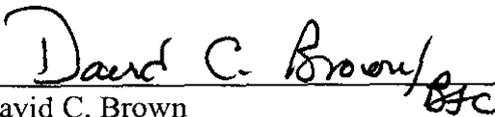
A copy of the foregoing Petition for Full Intervention has been served by United States mail on the following persons this the 8th day of January, 2004:

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